

May 12, 1973

Mr. Russell W. Itschner
Superintendent
Perry Gas Department
Perry, Missouri 39213

Dear Mr. Itschner:

This is in response to your letter dated April 25, 1973, regarding your failure to file an inspection and maintenance plan with our Office pursuant to Section 192.17, 49 CFR.

We do not have a form that you are required to fill out to comply with this regulation. The inspection and maintenance plan is a plan formulated by the gas operator, such as yourself, to be used in inspecting and maintaining your pipeline facilities. The plan should include the pertinent parts of Subpart I- Requirements for Corrosion Control, Subpart L- Operations and Subpart M- Maintenance of Part 192, 49 CFR, as well as other parts of Part 192 which would be required to properly operate and maintain your pipeline facilities.

The plan should be an instruction type manual specifying the operating and maintenance procedures which must be followed by the operator to assure the safe operation of the gas distribution system. The plan should incorporate inspection and maintenance procedures for at least the following items:

- (a) Distribution valves
- (b) Pressure Limiting and Regulating Stations
- (c) Pressure Relief Valves
- (d) Odorization Equipment
- (e) Mains and Services (Leak Repairs)
- (f) Customer Meters and Regulators
- (g) Cathodic Protection System (if applicable)
- (h) Leakage surveys
- (i) Patrolling of Distribution System
- (j) Surveillance of Distribution System
- (k) Emergency Plans
- (l) Investigation of Failures

Records should be available in gas operators office on the items mentioned above and the gas operator should have maps of the system available if they are necessary for the implementation of the inspection and maintenance plan. The Office of Pipeline Safety does not have a standard format for an inspection and maintenance plan, and each operator may formulate the type of plan which he feels will best suit his particular operation.

We trust that this has clarified this matter. Please submit an inspection and maintenance plan to us as quickly as possible.

Sincerely,

Cesar DeLeon
Compliance Officer
Office of Pipeline Safety

April 5, 1971

Mr. Mark P. Andrews, Jr.
Calbon, Walker, Cox & Andrews
Attorneys at Law
Park Plaza Building
Longview, Washington 98632

Dear Mr. Andrews:

This is in reply to your letter of February 24, 1971, concerning regulations applicable to a proposed natural gas transmission line of El Paso Natural Gas Company in two counties in the State of Washington.

We are enclosing copies of 49 CFR, Parts 190, 191, and 192, which are respectively, the Interim Minimum Federal Safety Standards for the Transportation of Gas by Pipeline (no longer in effect), leak reporting requirements, and the Minimum Federal Safety Standards which replaced the Interim Standards on August 11, 1970, pursuant to the Natural Gas Pipeline Safety Act of 1968, (hereinafter called the Act).

Our regulations do not require the filing with this Department of any project plans, nor does the Act authorize the Secretary of Transportation to prescribe the location or routing of any pipeline facility. Inspection and Maintenance Plans required by Section 192.17 have been filed with this Office. Leak reporting forms required from El Paso pursuant to Part 191, have been received by this Office.

We hope this answers your questions. If we can be of any further assistance, please let us know.

Sincerely,

Joseph C. Caldwell
Acting Director
Office of Pipeline Safety

Enclosures

March 10, 1971

Mr. Arthur N. Turner
City Attorney for Halstead
Branine, Ice, Turner & Ice
Attorneys & Counselors
110 East Sixth Street
Newton, Kansas 67114

Dear Mr. Turner:

This is in reply to your letter of March 4, 1971, concerning leak reporting requirements. For your information and compliance I am enclosing a copy of 49 CFR, Part 191 which contains the regulations on this subject.

We further invite your attention to 49 CFR, Section 192.17 which requires that you file plans of inspection and maintenance with this Office.

No agency of the State of Kansas has safety jurisdiction over municipal systems therefore, all your reports must be submitted directly to this Office.

Sincerely,

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety

Enclosure

March 10, 1971

Mr. Gaylon Simmons
General Manager
Delta Gas Inc.
861 Carondelet Street
New Orleans, Louisiana 70130

Dear Mr. Simmons:

This is in reply to your letter of March 3, 1971, requesting instructions for preparation of plan of inspection and maintenance required to be filed with this Office by the provisions of 49 CFR, Section 192.17.

We have not developed instructions for plans of inspection and maintenance. We would expect that such plans will at least comply with all the inspection and maintenance requirements of 49 CFR, Part 192. You may file a basic plan and amend it as you refine it in the future.

Sincerely,

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety